

## REMARKS

This is intended as a full and complete second response to the Final Office Action dated March 12, 2003, having a shortened statutory period for response set to expire on June 12, 2003, as well as a full and complete response to the Advisory Action dated May 14, 2003. Claims 1, 2, 4-5, 10-14, and 17-26 are pending in the application. Claims 11-12 and 19-26 are allowed. Claims 1-2, 13, 17-19, and 23 have been amended to more clearly claim aspects of the invention and to correct matters of form. Claims 27-38 have been added. No new matter has been added. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1, 2, 4, 5, and 10 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Callihan et al.* (U.S. Patent Number 4,413,682). The Examiner states that *Callihan et al.* discloses a cementing shoe having a housing for disposal at the end of a tubing string. The Examiner uses number 2 of *Callihan et al.* as the housing, and number 10 as the cement shoe. The Examiner states that the housing of *Callihan et al.* has an enlarged diameter opposite the number 26 near its lower end. The Examiner then states that the cement shoe is disposed in the housing and is drillable.

Applicants respectfully traverse the rejection of claims 1, 2, 4, 5, and 10. As discussed in a telephone interview with the Examiner conducted on July 28, 2003 by Kyla Cummings, attorney for Applicants, the enlarged inner diameter (designated as number 160), as shown in Figure 1 of the current application, is at the lowermost end of the housing, which is at the very bottom of the housing. Number 2 of *Callihan et al.*, as shown in Figures 3-5, does not have an enlarged inner diameter at the lowermost end. In fact, in Figure 4, the inner diameter of the housing actually decreases from the inner diameter encountered at upper portions of the housing, namely at the portion of 2 around numbers 22 and 26, to the lowermost end of the housing across from the number 34. Therefore, *Callihan et al.* does not teach, show, or suggest a tubular housing having an enlarged inner diameter portion at the lowermost end of the housing, as recited in claim 1, 2, 4, 5, and 10. Accordingly, Applicants respectfully request allowance of claims 1, 2, 4, 5, and 10.

Claims 13 and 14 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Gano et al.* (U.S. Patent Number 6,135,208). Claims 17 and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Gano et al.* in view of *Simpson* (U.S. Patent Number 6,457,532 B1). The Examiner states that *Gano et al.* discloses in Figure 7 a first tubing having an enlarged lower end and a second tubing that is to be expanded into the first tubing. The Examiner uses number 282 of *Gano et al.* to designate the first tubing and number 266 to designate the second tubing. Regarding claims 17 and 18, the Examiner states that *Gano et al.* discloses all of the claimed features except for the expansion member being a hydraulically operated expansion member having expanding means. The Examiner states that *Simpson* discloses an expander that has rollers pressed outwardly by hydraulic pressure, and considers it obvious to replace the expander of *Gano et al.* with the expander of *Simpson*.

Applicants respectfully traverse the rejection of claims 13, 14, 17, and 18. As discussed in the telephone interview with the Examiner conducted on July 28, 2003 by Kyla Cummings, attorney for Applicants, number 282 of *Gano et al.* does not decrease in thickness at its lower end or at the enlarged inner diameter portion, but maintains a constant wall thickness along its length. As such, *Gano et al.* does not teach, show, or suggest a first tubular decreasing in wall thickness at its lower end or at the enlarged inner diameter portion, as recited in claims 13-14 and 17-18. Therefore, *Gano et al.* does not teach, show, or suggest a connection made in a wellbore between two tubulars, the connection comprising a first tubular having an inside surface, the first tubular having an upset portion at its lower end wherein the first tubular decreases in wall thickness, and a second tubular having an expanded diameter in contact with the inside surface of the first tubular at its lower end, as recited in claim 13 and its dependent claim 14. Likewise, *Gano et al.*, alone or in combination with *Simpson et al.*, does not teach, show, or suggest a method of forming a connection in a wellbore between a first, larger diameter tubular and a second, smaller diameter tubular without enlarging the diameter of the first tubular, comprising providing the first tubular with an area of enlarged inside diameter at a lower end thereof, wherein a wall of the first tubular decreases in thickness at the area of enlarged inside diameter, as recited in claim 17. Furthermore, *Gano et al.*, alone or in combination with *Simpson et al.*, does

not teach, show, or suggest a method of forming a connection between two wellbore tubulars comprising placing a first wellbore tubular having an outer diameter and a first end in proximity of a second wellbore tubular, the second wellbore tubular having an enlarged inner diameter portion formed by reducing a thickness of a wall of the second wellbore tubular at a second end, wherein the enlarged inner diameter portion is proximate the second end, as recited in claim 18. Accordingly, Applicants respectfully request allowance of claims 13, 14, 17, and 18.

Claims 27 and 28 are dependent upon claims 17 and 18, respectively. At least because of the reasons discussed above in relation to claims 17-18, claims 27-28 are not taught, shown, or suggested by *Gano et al.*, alone or in combination with *Simpson et al.* Therefore, Applicants respectfully request allowance of claims 27-28.

Regarding new claims 29-38, *Gano et al.* does not disclose a first tubular having a wall having a first thickness at a first portion and a second thickness at a second portion. As discussed above, number 282 of *Gano et al.* does not have a first thickness and a second thickness, but maintains a constant wall thickness along its length. Therefore, *Gano et al.*, alone or in combination with any other reference, does not teach, show, or suggest a method of forming a connection in a wellbore between two tubulars, comprising providing a second tubular and a first tubular having an enlarged inner diameter portion, the first tubular having a wall having a first thickness at a first portion and a second thickness at a second portion, locating the second tubular coincident with the enlarged inner diameter portion of the first tubular, and expanding the second tubular radially, such that an outer diameter of the second tubular frictionally contacts the enlarged inner diameter portion, as recited in claim 29 and its dependent claims 30-34. Moreover, *Gano et al.*, alone or in combination with any other reference, does not teach, show or suggest a connection made in a wellbore between two tubulars, comprising a first tubular having an inside surface, the first tubular having a wall having a first thickness at a first portion and a second thickness at a second portion, and a second tubular having an expanded diameter in contact with the inside surface of the first tubular at the second portion, whereby the diameter of the first tubular is not substantially expanded and an inside diameter of both tubulars is

substantially the same, as recited in claim 35 and its dependent claims 36-38. Therefore, Applicants respectfully request allowance of claims 29-38.

In conclusion, the references cited by the Examiner, neither alone nor in combination, teach, show, or suggest the method or apparatus of the present invention. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request allowance of the claims.

The prior art made of record is noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, it is believed that a detailed discussion of the secondary references is not deemed necessary for a full and complete response to this office action. Accordingly, allowance of the claims is respectfully requested.

Respectfully submitted,

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